

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

QUALCOMM INC., and QUALCOMM)	
TECHNOLOGIES, INC.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 24-490 (MN)
)	
ARM HOLDINGS PLC,)	
)	
Defendant.)	

**ORDER RELATING TO PROCEDURES FOR
RESOLVING DISPUTES BEFORE SPECIAL MASTER**

Prior to contacting the Special Master regarding a discovery dispute or motion to amend/strike, the parties shall confer in good faith pursuant to D. Del. LR 7.1.1 to attempt to resolve or narrow the issues in dispute. As ordered by the Court, the parties must first advise Chambers “of any new or additional disputes the parties wish to bring before the Special Master.” *See* Order Appointing Special Master, D.I. 336 ¶ 3.

After following the above requirements, Delaware counsel for the moving party shall contact the Special Master by email (HRychlicki@pwujlaw.com) to schedule a hearing and copy opposing Counsel on this correspondence (“Counsel’s Request”). Counsel’s Request shall include a short (no more than one paragraph) non-argumentative identification of the nature of the dispute, a D. Del. LR 7.1.1 certification that the parties are at an impasse regarding this dispute and identify any time consideration as to resolving the dispute. Counsel’s Request shall be sent by the District of Delaware’s 5:00 P.M. Eastern Time filing deadline, and accompanied by a motion, along with an opening letter brief in support of that motion outlining the issues in dispute, the applicable law, and its position on those issues. All exhibits and case law/transcripts cited and/or relied upon must accompany the letter brief.

The opening letter brief shall not exceed 2400 words, single-spaced, in no less than 12-point font. The party's cover page and signature block are not included in the word count. The actual number of words used (as reported by the word-processing system used) must be included after the signature block.

Following Counsel's Request, the Special Master may schedule a telephonic, video, or in-person hearing for the discovery motion(s). Video hearings are the preferred method. Unless otherwise ordered, the additional procedures set forth below shall apply. Upon request of a party, the Special Master may modify these procedures, including by modifying or extending the briefing schedule or page limits to accommodate the nature of the dispute or the schedules of the parties and their counsel.

The parties will provide the Special Master with copies of unredacted pleadings filed under seal to provide background information, as well as copies of the Protective Order and ESI Order entered in this action.

1. Hearing, Motion, and Briefs: The Special Master shall set a hearing at a time convenient to her that, if practical, will occur approximately seven or eight (7 or 8) business days after Counsel's Request. Within four (4) or five (5) business days after the Counsel's Request, as agreed by the parties in advance, any party opposing the motion may email the Special Master a responsive letter brief outlining that party's reasons for its opposition. All briefs, any supporting exhibits, and cited case law/transcripts shall be emailed to the Special Master and counsel for the opposing party by the District of Delaware's 5:00 P.M. Eastern Time filing deadline. Unless otherwise ordered, opposition letter briefs shall not exceed 2400 words, single-spaced, in no less than 12-point font. The party's cover page and signature block are not included in the word

count. The actual number of words used (as reported by the word-processing system used) must be included after the signature block.

2. Attachments/Exhibits: Generally, there should be limited attachments or exhibits to the letters. For example, in a protective order dispute, only the provisions at issue should be attached. Similarly, regarding interrogatory/request for production issues, only the disputed interrogatory or request for production and the responses as they exist at the time of the letter submissions should be attached. The parties may, however, include full copies of documents if they believe the context of the document at issue could be helpful to the Special Master. The parties' correspondence relating to the dispute also may be attached as exhibits. Cases/transcripts cited and/or relied upon in the letter submission should be forwarded as well.

3. Further Briefing: Should the Special Master find further briefing necessary upon conclusion of the hearing, she will order it.

4. Notice to Court: Pursuant to the Court's July 18, 2025 Order Appointing Special Master (D.I. 336), all discovery motions brought before the Special Master (but not the related briefing and appendices, if any) shall be filed with the Court. Only the formal motion itself must be docketed with the Court. All other discovery materials should be lodged only with the Special Master. For any new or additional disputes the parties wish to bring before the Special Master, the parties must first advise Chambers, by emailing the Court's Judicial Administrator.

SO ORDERED this 31st day of July, 2025.

/s/ Helena C. Rychlicki
Helena C. Rychlicki, Special Master